

REPORTS ANALYSIS DIVISION REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: December 23, 2011

ANALYST: Bradley Matheson

- I. COMMITTEE: Chuck Wilkerson for Congress
C00478578
Patricia Louise Motta, Treasurer
1513 E. Elm Ave
El Segundo, CA 90245-3220
- II. RELEVANT STATUTES: 11 CFR §§ 104.3(a) and (b)
2 U.S.C. §§ 434(b)(2) and (4)

III. BACKGROUND:

Failure to Provide Supporting Schedules (Failure to Disclose All Financial Activity)

Chuck Wilkerson for Congress ("the Committee") amended its 2010 October Quarterly, 2010 12 Day Pre-General, 2010 30 Day Post-General and 2011 April Quarterly Reports to disclose additional receipts of \$11,060.24 and additional disbursements of \$129,462.15, which were not reported in the original reports (Attachment 2).

2010 October Quarterly Report

On October 15, 2010, the Committee filed the original 2010 October Quarterly Report covering the period from July 1, 2010 through September 30, 2010. The report disclosed \$9,003.00 in receipts on Line 11(a)(i) (Itemized Contributions from Individuals) and \$0.00 on Line 11(a)(ii) (Unitemized Contributions from Individuals) of the Detailed Summary Page (Image 10931524052). The report also disclosed \$110,902.42 in disbursements on Line 17 (Operating Expenditures) and \$0.00 on Line 19(a) (Loan Repayments Made to the Candidate) of the Detailed Summary Page (Image 10931524053).

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On May 23 and May 25, 2011, the Committee filed Amended 2010 October Quarterly Reports. The reports disclosed no change in receipts and disbursements from the original report (Images 11931518220, 11931526373, and 11931526421).

On July 28, 2011, the Committee filed an Amended 2010 October Quarterly Report. The report disclosed \$16,885.24 on Line 11(a)(i) and \$3,178.00 on Line 11(a)(ii) of the Detailed Summary Page, an increase of \$11,060.24 from the original report (Image 11932088457, Attachment 3). The report also disclosed \$114,444.37 in disbursements on Line 17 and \$1,611.16 on Line 19(a) of the Detailed Summary Page (Image 11932088458).

On the same day, the Committee filed another Amended 2010 October Quarterly Report. The report disclosed no change in receipts from the previous amendment (Image 11932110833). The report disclosed \$114,444.37 in disbursements on Line 17 and \$2,211.16 on Line 19(a) of the Detailed Summary Page, an increase of \$5,753.11 from the original report (Image 11932110834, Attachment 4).

2010 12 Day Pre-General Report

On October 21, 2010, the Committee filed the original 2010 12 Day Pre-General Report covering the period from October 1, 2010 through October 13, 2010. The report disclosed \$36,930.36 in disbursements on Line 17 (Operating Expenditures) of the Detailed Summary Page (Image 10931748292).

On August 4, 2011, the Committee filed an Amended 2010 12 Day Pre-General Report. The report disclosed \$37,369.66 in disbursements on Line 17 of the Detailed Summary Page, an increase of \$439.30 from the original report (Image 11932148306, Attachment 4).

2010 30 Day Post-General Report

On December 1, 2010, the Committee filed the original 2010 30 Day Post-General Report covering the period from October 14, 2010 through November 22, 2010. The report disclosed \$0.00 in disbursements on Line 17 (Operating Expenditures) of the Detailed Summary Page (Image 10992286506).

On April 16, 2010, the Committee filed an Amended 2010 30 Day Post-General Report. The report disclosed no change in disbursements from the original report (Image 11930710205).

On July 15, 2011, the Committee filed an Amended 2010 30 Day Post-General Report. The report disclosed \$122,538.38 in disbursements on Line 17 of the Detailed Summary Page (Image 11931930819).

On July 28, 2011, the Committee filed an Amended 2010 30 Day Post-General Report. The report disclosed \$121,958.43 in disbursements on Line 17 of the Detailed Summary Page, an increase of \$121,958.43 from the original report (Image 11932110139, Attachment 4).

On August 4, 2011, the Committee filed an Amended 2010 30 Day Post-General Report. The report disclosed no change in disbursements from the previous amendment (Image 11932150346).

2011 April Quarterly Report

On April 17, 2011, the Committee filed the original 2011 April Quarterly Report covering the period from January 1, 2011 through March 31, 2011. The report disclosed \$0.00 in disbursements on Line 19(a) (Loan Repayments Made to the Candidate) of the Detailed Summary Page (Image 11930710293).

On August 4, 2011, the Committee filed an Amended 2011 April Quarterly Report. The report disclosed \$1,311.31 in disbursements on Line 19(a) of the Detailed Summary Page, an increase of \$1,311.31 from the original report (Image 11932150524, Attachment 4).

On September 2, 2011, a Request for Additional Information (RAFI) was sent to the Committee referencing the Amended 2011 April Quarterly Report, received August 4, 2011. Among other items, the RAFI requested clarification regarding the substantial increase in receipts and disbursements disclosed on the Amended 2010 October Quarterly Report, Amended 2010 12 Day Pre-General Report, Amended 2010 30 Day Post-General Report, and Amended 2011 April Quarterly Report that were not disclosed in the original filings (Image 11330013206).

On September 21, 2011, the Committee filed a Miscellaneous Electronic Submission ("Form 99"). In part, the Committee stated:

"...Increase in Receipts for the 2010 October Quarterly Report - In my original report, I discovered that I had failed to account for expenditures on my personal credit card for campaign expenses. In the amended report, these were entered as campaign contributions by the candidate and additions to disbursements.

...Increase in Disbursements for the 2010 October Quarterly, 12 Day Pre-General, and 30 Day Post-General Reports - These were the result of a

¹ The RAFI also requested clarification regarding the substantial increase in the amount of disbursements disclosed on the Amended 2010 Year End Report, received 6/13/11. On 11/16/11, the Committee filed an Amended 2010 Year End Report to reduce the disbursements to the amount disclosed on the original report. Therefore, the 2010 Year End Report is not included in the referral.

thorough review of all disbursements and corrections of the same The entire Sched B import for the 30-Day Post-General Report was inadvertently omitted, thus going from zero in the original to \$121,958.43 in the amended report.

...Increase in Disbursements for the...2011 April Quarterly [Report] - These loan repayments to the candidate were overlooked in the initial reports" (Image 11932491579).

On September 22, 2011, Mr. Wilkerson called the Reports Analysis Division (RAD) Analyst to ask if the Committee's Form 99 had been reviewed. The Analyst explained that the Form 99 had not yet been reviewed but it would be reviewed in the next few days if he wanted to call back (Attachment 5).

On October 31 and November 7, 2011, the RAD Analyst called Mr. Wilkerson to discuss the changes in activity disclosed on the amendments, among other items. The Analyst was unable to reach him or leave a voicemail (Attachment 5).

On November 8, 2011, the RAD Analyst called Mr. Wilkerson using an alternative phone number. The Analyst mentioned the Committee had outstanding issues on several reports that needed to be addressed. Mr. Wilkerson indicated that he would first like to review the reports and call the Analyst back the following day (Attachment 5).

On November 9, 2011, Mr. Wilkerson called the RAD Analyst. Among other items, the Analyst told Mr. Wilkerson that the matter involving the changes in activity disclosed on the amendments would be forwarded to another office for further Commission action. The Analyst stated that if the Committee wanted to provide further clarification on the issue, they could submit additional information for the public record (Attachment 5).

On November 16, 2011, the Committee filed a Termination Report covering the period from October 1, 2011 through November 16, 2011 (Image 11952796716).

To date, no further communications have been received from the Committee regarding these matters.

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O-Index (2011-2012)															
Cmte. ID: C00478578 Cmte. Name: CHUCK WILKERSON FOR CONGRESS															
Treasurer Name: PATRICIA LOUISE MOTTA Address: 1513 E ELM AVE, EL SEGUNDO, CA 90245-3220															
Cmte. Type: H (HOUSE) Cr. Fr. Designation: P (PRINCIPAL CAMPAIGN COMMITTEE OF A CANDIDATE) Filing Frequency: QUARTERLY FILER															
Form Tp	Rpt Tr	AI	Receipt Dt	Pgs	Begin Img#	Begin Cvg Dt	End Cvg Dt	Ltr Mail Dt	Begin Cash	Receipts	Disb	End Cash	Debits	Loans	Debits & Loans
MS-T			4/26/2011	2	11030601219					-	-	-	-	-	-
MS-T			6/1/2011	7	11030611924	7/1/2010	9/30/2010			-	-	-	-	-	-
MS-T			9/21/2011	2	11932491579					-	-	-	-	-	-
RQ2	Q1	A	9/2/2011	3	11330013206	1/1/2011	3/31/2011	9/2/2011		-	-	-	-	-	-
RQ2	Q2	N	8/1/2011	2	11030644448	4/1/2011	6/30/2011	8/1/2011		-	-	-	-	-	-
F3N	Q1	N	4/17/2011	4	11930710290	1/1/2011	3/31/2011		\$119,411	\$0	\$0	\$119,411	-	\$336,702	\$336,702
F3A	Q1	A	8/4/2011	56	11932150521	1/1/2011	3/31/2011		\$1,056	\$0	\$1,311	(\$255)	-	\$412,310	\$305,623
F3N	Q2	N	8/4/2011	55	11932150577	4/1/2011	6/30/2011		(\$255)	\$0	\$0	(\$255)	-	\$305,623	\$305,623
F3N	Q3	N	10/4/2011	55	11952503206	7/1/2011	9/30/2011		(\$255)	\$0	\$0	(\$255)	-	\$305,623	\$305,623
F3T	TER	T	11/16/2011	57	11952796716	10/1/2011	11/16/2011		(\$255)	\$0	\$0	(\$255)	-	\$305,623	\$305,623
Totals									\$0	\$1,311					

O-Index (2009-2010)															
Cmte. ID: C00478578 Cmte. Name: CHUCK WILKERSON FOR CONGRESS															
Treasurer Name: PATRICIA LOUISE MOTTA Address: 1513 E ELM AVE, EL SEGUNDO, CA 90245-3220															
Cmte. Designation: P (PRINCIPAL CAMPAIGN COMMITTEE OF A CANDIDATE) Filing Frequency: QUARTERLY FILER															
Form Tp	Rpt Tp	AI	Receipt Dt	Pgs	Begin Img#	Begin Cvg Dt	End Cvg Dt	Ltr Mail Dt	Begin Cash	Receipts	Disb	End Cash	Debits	Loans	Debits & Loans
RQ2	Q1	N	7/1/2010	3	10030354616	1/1/2010	3/31/2010	7/1/2010		-	-	-	-	-	-
RQ2	Q1	A	8/19/2010	3	10030412067	1/1/2010	3/31/2010	8/19/2010		-	-	-	-	-	-
RQ2	12P	N	7/1/2010	3	10030354613	4/1/2010	5/19/2010	7/1/2010		-	-	-	-	-	-
RQ2	12P	A	8/19/2010	3	10030412070	4/1/2010	5/19/2010	8/19/2010		-	-	-	-	-	-
RQ2	Q2	A	8/19/2010	4	10030412076	5/20/2010	6/30/2010	8/19/2010		-	-	-	-	-	-
RQ2	Q3	N	3/30/2011	3	11330006805	7/1/2010	9/30/2010	3/30/2011		-	-	-	-	-	-
RQ2	12G	N	3/30/2011	2	11330006808	10/1/2010	10/13/2010	3/30/2011		-	-	-	-	-	-
RQ2	30G	N	3/30/2011	3	11330006610	10/14/2010	11/22/2010	3/30/2011		-	-	-	-	-	-
RQ2	YE	A	6/2/2011	2	11330010023	11/23/2010	12/31/2010	6/2/2011		-	-	-	-	-	-
RQ2	YE	A	8/29/2011	2	11330012925	11/23/2010	12/31/2010	8/29/2011		-	-	-	-	-	-
F3N	Q1	N	6/18/2010	12	10990786570	1/1/2010	3/31/2010		\$0	\$32,507	\$22,407	\$10,100	-	\$32,507	\$32,507
F3A	Q1	A	7/24/2010	14	10991026203	1/1/2010	3/31/2010		\$0	\$33,624	\$23,524	\$10,100	-	\$33,624	\$33,624
F3A	Q1	A	7/26/2010	14	10991026801	1/1/2010	3/31/2010		\$0	\$33,624	\$23,524	\$10,100	-	\$33,624	\$33,624
F3A	Q1	A	9/22/2010	14	10991222367	1/1/2010	3/31/2010		\$0	\$33,624	\$23,524	\$10,100	-	\$33,624	\$33,624
F3N	12P	N	6/18/2010	21	10990792197	4/1/2010	5/19/2010		\$10,100	\$47,039	\$45,888	\$11,250	-	\$45,000	\$45,000
F3A	12P	A	7/24/2010	23	10991026284	4/1/2010	5/19/2010		\$10,100	\$57,376	\$32,870	\$34,605	-	\$110,675	\$55,337
F3A	12P	A	7/27/2010	22	10991027325	4/1/2010	5/19/2010		\$10,100	\$57,376	\$32,870	\$34,605	-	\$88,962	\$88,962
F3A	12P	A	7/28/2010	22	10931075296	4/1/2010	5/19/2010		\$10,100	\$57,376	\$32,870	\$34,605	-	\$88,962	\$88,962
F3A	12P	A	9/22/2010	22	10991222381	4/1/2010	5/19/2010		\$10,100	\$57,376	\$32,870	\$34,605	-	\$88,962	\$88,962
F3N	Q2	N	7/15/2010	15	10990922702	5/20/2010	6/30/2010		\$0	\$9,125	\$29,478	(\$20,353)	-	\$14,400	\$7,200
F3A	Q2	A	7/28/2010	22	10931075348	5/20/2010	6/30/2010		\$34,605	\$10,497	\$30,669	\$14,434	-	\$97,339	\$97,339
F3A	Q2	A	9/22/2010	22	10991222403	5/20/2010	6/30/2010		\$34,605	\$10,497	\$30,669	\$14,434	-	\$97,339	\$97,339
F3N	Q3	N	10/15/2010	48	10931524050	7/1/2010	9/30/2010		\$14,434	\$115,933	\$110,902	\$19,465	-	\$204,270	\$204,270
F3A	Q3	A	5/23/2011	48	11931518220	7/1/2010	9/30/2010		\$14,434	\$115,933	\$110,902	\$19,465	-	\$204,270	\$204,270

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F3A	Q3	A	5/25/2011	48	11931526421	7/1/2010	9/30/2010		\$14,434	\$115,933	\$110,902	\$19,465	-	\$204,270	\$204,270
F3A	Q3	A	5/25/2011	48	11931526373	7/1/2010	9/30/2010		\$14,434	\$115,933	\$110,902	\$19,465	-	\$204,270	\$204,270
F3A	Q3	A	7/28/2011	100	11932110830	7/1/2010	9/30/2010		\$14,434	\$126,994	\$116,655	\$24,772	-	\$202,059	\$202,059
F3A	Q3	A	7/28/2011	99	11932088455	7/1/2010	9/30/2010		\$14,434	\$126,994	\$116,055	\$25,372	-	\$291,590	\$202,659
F3N	12G	N	10/21/2010	21	10931748289	10/1/2010	10/13/2010		\$19,465	\$20,113	\$36,930	\$2,648	-	\$219,569	\$219,569
F3A	12G	A	8/4/2011	70	11932148303	10/1/2010	10/13/2010		\$24,772	\$20,113	\$37,369	\$7,516	-	\$306,268	\$217,357
F3N	30G	N	12/1/2010	20	10992286502	10/14/2010	11/22/2010		\$2,648	\$130,701	\$4,123	\$129,226	-	\$336,702	\$336,702
F3A	30G	A	4/16/2011	20	11930710205	10/14/2010	11/22/2010		\$2,648	\$130,701	\$4,123	\$129,226	-	\$336,702	\$336,702
F3A	30G	A	7/15/2011	98	11931930815	10/14/2010	11/22/2010		\$2,648	\$130,736	\$126,661	\$6,723	-	\$336,702	\$336,702
F3A	30G	A	7/28/2011	108	11932110135	10/14/2010	11/22/2010		\$8,555	\$129,436	\$126,081	\$11,910	-	\$421,650	\$317,334
F3A	30G	A	8/4/2011	108	11932150346	10/14/2010	11/22/2010		\$7,516	\$129,436	\$126,081	\$10,871	-	\$316,734	\$316,734
F3N	YE	N	1/18/2011	5	11990067201	11/23/2010	12/31/2010		\$129,226	\$0	\$9,815	\$119,411	-	\$336,702	\$336,702
F3A	YE	A	4/16/2011	5	11930710191	11/23/2010	12/31/2010		\$129,226	\$0	\$9,815	\$119,411	-	\$673,404	\$336,702
F3A	YE	A	4/16/2011	5	11930710200	11/23/2010	12/31/2010		\$129,226	\$0	\$9,815	\$119,411	-	-	\$336,702
F3A	YE	A	6/13/2011	6	11931645060	11/23/2010	12/31/2010		\$129,226	\$0	\$19,615	\$109,611	-	\$326,902	\$326,902
F3A	YE	A	11/16/2011	56	11971847818	11/23/2010	12/31/2010		\$10,871	\$0	\$9,815	\$1,056	-	\$413,621	\$306,934
F1		N	3/16/2010	6	10030270619				-	-	-	-	-	-	-
F2		N	3/16/2010	2	10030270626				-	-	-	-	-	-	-
F6			6/18/2010	2	10030352079				-	-	-	-	-	-	-
F6			10/22/2010	2	10991790156				-	-	-	-	-	-	-
F6			10/21/2010	2	10931703291				-	-	-	-	-	-	-
F6			11/3/2010	2	10991814178				-	-	-	-	-	-	-
Totals									\$378,043	\$376,986					

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Cmte. ID: C00478578 Cmte. Name: CHUCK WILKERSON FOR CONGRESS

Treasurer Name: PATRICIA LOUISE MOTTA Address: 1513 E ELM AVE, EL SEGUNDO, CA 90245-3220

Cmte. Type: H (HOUSE) Cmte. Designation: P (PRINCIPAL CAMPAIGN COMMITTEE OF A CANDIDATE) Filing Frequency: QUARTERLY FILER

Form Tp	Rpt Tp	AI	Recpt Dt	Pgs	Begin Ing#	Beg Cvg Dt	End Cvg Dt	Ltr Mail Dt	Begin Cash	Recpts	Disb	End Cash	Debits	Loans	Debits & Loans
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No records were found for this cycle.

Chuck Wilkerson for Congress (C00478578)

Overview of Additional Receipts

Report Name	Total Additional Receipts	Line Numbers
2010 October Quarterly Report/Amended 2010 October Quarterly Report, received 7/28/11	\$11,060.24	11(a)(i) and (ii)
Total Additional Receipts	\$11,060.24	

Overview of Additional Disbursements

Report Name	Total Additional Disbursements	Line Numbers
2010 October Quarterly Report/Amended 2010 October Quarterly Report, received 7/28/11	\$5,753.11	17, 19(a)
2010 12 Day Pre-General Report/Amended 2010 12 Day Pre-General Report, received 8/4/11	\$439.30	17
2010 30 Day Post-General Report/Amended 2010 30 Day Post-General Report, received 8/4/11	\$ 121,958.43	17
2011 April Quarterly Report/Amended 2011 April Quarterly Report, received 8/4/11	\$1,311.31	19(a)
Total Additional Disbursements	\$129,462.15	

Chuck Wilkerson for Congress (C00478578)

Additional Receipts by Line Number

2010 October Quarterly Report/Amended 2010 October Quarterly Report, received 7/28/11

Report Line	2010 October Quarterly Report (Image 1093152+050)	Amended 2010 October Quarterly Report, received 7/28/11 (Image 11932+10830)	Variance Amount
Line 11(a)(i): Itemized Contributions from Individuals	\$9,003.00	\$16,885.24	\$7,882.24
Line 11(a)(ii): Unitemized Contributions from Individuals	\$0.00	\$3,178.00	\$3,178.00
		Total Variance:	\$11,060.24

Chuck Wilkerson for Congress (C00478578)

Additional Disbursements by Line Number

2010 October Quarterly Report/Amended 2010 October Quarterly Report, received 7/28/11

Report Line	2010 October Quarterly Report (Image 10931524050)	Amended 2010 October Quarterly Report, received 7/28/11 (Image 11932110850)	Variance Amount
Line 17: Operating Expenditures	\$110,902.42	\$114,444.37	\$3,541.95
Line 19(a): Loan Repayments made to the Candidate	\$0.00	\$2,211.16	\$2,211.16
		Total Variance:	\$5,753.11

2010 12 Day Pre-General Report/Amended 2010 12 Day Pre-General Report, received 8/4/11

Report Line	2010 12 Day Pre- General Report (Image 10931748280)	Amended 2010 12 Day Pre-General Report, received 8/4/11 (Image 11932148500)	Variance Amount
Line 17: Operating Expenditures	\$36,930.36	\$37,369.66	\$439.30
		Total Variance:	\$439.30

2010 30 Day Post-General Report/Amended 2010 30 Day Post-General Report, received 8/4/11

Report Line	2010 30 Day Post- General Report (Image 10992286502)	Amended 2010 30 Day Post-General Report, received 8/4/11 (Image 11932150346)	Variance Amount
Line 17: Operating Expenditures	\$0.00	\$121,958.43	\$121,958.43
		Total Variance:	\$121,958.43

2011 April Quarterly Report/Amended 2011 April Quarterly Report, received 8/4/11

Report Line	2011 April Quarterly Report (Image 11932171020)	Amended 2011 April Quarterly Report, received 8/4/11 (Image 11932171020)	Variance Amount
Line 19(a): Loan Repayments made to the Candidate	\$0.00	\$1,311.31	\$1,311.31
		Total Variance:	\$1,311.31

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